

# EXHIBIT 19

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**Plaintiffs,**

- against - Civil Action No.  
10-cv-8668

10 JACOB WOHL, JACK BURKMAN, J.M.  
11 BURKMAN & ASSOCIATES, LL, PROJECT  
12 1599, and JOHN and JANE DOES 1-10,  
Defendants.

Remote deposition  
April 26, 2022  
10:15 a.m.

VIDEO-RECORDED VIDEOCONFERENCE 30 (B) (6)

DEPOSITION of J.M. BURKMAN & ASSOCIATES, by JOHN  
BURKMAN, before Michele Moskowitz, a shorthand  
reporter and Notary Public of the State of New  
York.

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11 ALSO PRESENT:

12 MIRIAM LI, LEGAL ANALYST

13 REBECCA McMANUS, VIDEOGRAPHER

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1 BURKMAN - 30(B)(6)

2 stated, but I'll say again, I'm Colleen Kelly  
3 Faherty. I'm an attorney with the New York  
4 Attorney General's Office and will be conducting  
5 this examination today. Also present for this  
6 deposition from my office are my colleagues  
7 Connor Duffy, Rick Sawyer, and legal analyst  
8 Miriam Li.

9 Mr. Burkman, you've been designated  
10 as the corporate representative in this  
11 examination in response to noticed testimony  
12 issued by the Attorney General's Office in  
13 connection with the Southern District of New York  
14 lawsuit the National Coalition of Black Civic  
15 Participation vs. Wohl. Do you understand that?

16 A. Yes, ma'am.

17 Q. Okay. And when I refer to J.M.  
18 Burkman & Associates, I may also refer to it as  
19 Burkman & Associates, is that okay?

20 A. Whatever you prefer. Whatever you  
21 like.

22 Q. Okay. And so if I did that, you  
23 would understand that I'm asking about the entity  
24 that you're here representing?

25 A. Yes, ma'am.

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1                    BURKMAN - 30(B)(6)

2        A.        Either '02 or '03, one or the other.

3        Q.        Do you have a title at Burkman &  
4     Associates?

5        A.        I think it is -- I think I call  
6     myself president.

7        Q.        Do you think or do you know?

8        A.        Oh, wait a minute. No. It's a  
9     single-member LLC, so technically my title under  
10    Virginia law is managing member, but in the -- in  
11    the parlance of the vernacular I -- I believe I  
12    just say I'm the president.

13      Q.        Are there any articles of  
14     incorporation that would identify the  
15     organizational structure of the --

16      A.        It's an LLC, so there was -- years  
17    ago -- two decades ago I'm sure there was an  
18    operating agreement when the articles were  
19    formed. Probably something very brief from 20  
20    years ago.

21      Q.        Did you file that operating agreement  
22    with any state entity to incorporate --

23      A.        We -- yeah. When it was set up,  
24    we -- this is -- and I forget. I probably  
25    haven't looked at it in 20 years. This is --

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1                    BURKMAN - 30(B)(6)

2                    A.         I oversee the business. I mean, it's  
3 a very, very small firm. I oversee the business.  
4 I supervise the business. Oversee and supervise.

5                    Q.         And what business is that? What are  
6 the business services provided by Burkman &  
7 Associates?

8                    A.         Oh, about -- I mean, it's all  
9 quote/unquote Washington stuff. About half of it  
10 would be lobbying and legal services, the other  
11 half would be, you know, a range of things that  
12 would go from public relations to giving people  
13 general political advice to helping people  
14 prepare documents that they might use for a  
15 federal agency, something like that. It's about  
16 half and half.

17                  Q.         Anything else?

18                  A.         No. That's about it. I mean,  
19 occasionally -- occasionally just pure legal work  
20 for maybe agency stuff.

21                  Q.         Anything else?

22                  A.         Nothing comes to mind.

23                  Q.         Okay. So tell me if I've captured  
24 it. You provide lobbying services, right?

25                  A.         Yes.

1                    BURKMAN - 30(B)(6)

2        And this is what I did.

3                    Q.        Okay. Is there anything else that  
4        you recall about the use of the J.M. Burkman &  
5        Associates checking account for issuing -- the  
6        issuance of a Message Communications check on  
7        June 23, 2020?

8                    A.        No, I don't. Nothing else.

9                    Q.        Do you recall whether there are any  
10      other documents created in connection with the  
11      use of a J.M. Burkman & Associates check on June  
12      23, 2020, to be issued to Message Communications?

13                  A.        The -- the business had -- the  
14      business had no involvement with any documents or  
15      any -- any -- or any robocalls.

16                  Q.        Okay. All right. Let's look at the  
17      next check. So at the bottom of your screen,  
18      which still is Exhibit 53, it's the second check.  
19      Do you see that there?

20                  A.        Yes.

21                  Q.        And this appears to be a check from  
22      J.M. Burkman & Associates, LLC, right?

23                  A.        Right.

24                  Q.        Check No. 19921, did I read that  
25      correctly?

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1                    BURKMAN - 30(B)(6)

2                    A.        Yes.

3                    Q.        Dated August 21, 2020?

4                    A.        Yes.

5                    Q.        Can you decipher who the paid to the  
6 order of name is there?

7                    A.        It would appear to be -- it appears  
8 the writing is Message Communications.

9                    Q.        And who is Message Communications?

10                  A.        Fifth Amendment.

11                  Q.        Okay. And what, if any, business did  
12 J.M. Burkman & Associates do with Message  
13 Communications?

14                  A.        J.M. Burkman & Associates had no  
15 involvement with Message Communications.

16                  Q.        Okay. And sorry, am I reading this  
17 correctly, both checks here in this Exhibit 53,  
18 they're both for \$1,000, right?

19                  A.        Yes. It would appear so.

20                  Q.        Okay. And still again looking at the  
21 second check on the bottom, No. 19921 in the  
22 lower left-hand side, there's that "for" line  
23 again. Do you use there?

24                  A.        Yes. Oh, yes.

25                  Q.        And what is that? Can you decipher

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1 C E R T I F I C A T I O N

2 STATE OF NEW YORK )

)

3 COUNTY OF NEW YORK )

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6 I, MICHELE MOSKOWITZ, a Shorthand Reporter  
7 and Notary Public within and for the State of New  
8 York, do hereby certify:

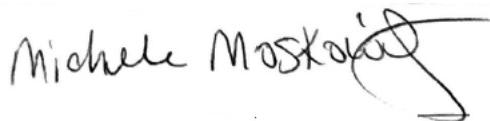
9 That JOHN BURKMAN, the witness whose  
10 examination is hereinbefore set forth, was duly  
11 sworn/affirmed by me and that this transcript of  
12 such examination is a true record of the  
13 testimony given by such witness.

14 I further certify that I am not related to  
15 any of the parties to this action by blood or  
16 marriage and that I am in no way interested in  
17 the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set my  
19 hand this 2nd day of May, 2022.

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22   
23

24 MICHELE MOSKOWITZ

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